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Autonomous User Rehabilitation Agent, LLC

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF NEW JERSEY**

LIMA JEVREMOVIĆ, an individual; and  
AUTONOMOUS USER REHABILITATION  
AGENT, LLC, a Delaware Limited Liability  
Company,

Plaintiffs,

vs.

BRITTANY JEREAM COURVILLE, an  
individual; and THAT SURPRISE WITNESS  
TV LLC, a New Jersey Limited Liability  
Company,

Defendants.

Civil Action No: 3:22-cv-04969-ZNQ-RLS

*Document Electronically filed*

**VERIFIED      FOURTH      AMENDED  
COMPLAINT**

**DEMAND FOR JURY TRIAL**

Plaintiffs, Lima Jevremović (“Ms. Jevremović”), and Autonomous User Rehabilitation Agent, LLC (“AURA”) (together, “Plaintiffs”), by and through their undersigned counsel, Epstein Ostrove, LLC, together with Rodney Smolla, Esq., file this Fourth Amended Complaint against

Defendants Brittany Jeream Courville (“Ms. Courville”) and That Surprise Witness TV LLC (the “Entity Defendant”) (collectively, “Defendants”), and say:

### **PARTIES**

1. AURA was a limited liability company organized under the laws of Delaware, with its registered address and principal place of business located at 900 Winslow Way E Ste 300, Bainbridge Island, Washington 98110-2450, and with no member domiciled in New Jersey. AURA operated as a wellness supplements and healthcare solutions software business. AURA was closed in February 2024, as no investors were willing to make investment due to Defendants’ campaign of misrepresentations and lies about Plaintiffs.

2. Ms. Jevremović is a resident of the State of California. Ms. Jevremović is the founder and CEO of AURA. She and her family have been harassed and received threats from third parties as a result of the claims in this matter. Her home address was disseminated (and unknown third parties attempted to gain entry while the family was home). She and her family were forced to relocate their residence, more than once, and were forced to hire a 24-hour security to guard their home. Ms. Jevremović therefore has not provided her California address in court filings so she will not be forced to relocate, yet again.

3. Ms. Courville is an individual who resides in Princeton, New Jersey, operates the various “That Surprise Witness” social media channels, and formed the Entity Defendants.

4. The Entity Defendant was formed in New Jersey, under file number 450708640, on September 30, 2021, to carry out the activities of Ms. Courville on the various “That Surprise Witness” social media channels.

### **JURISDICTION**

5. This Court has jurisdiction pursuant to 28 U.S.C. §1332, because complete diversity exists amongst the parties and the amount in controversy far exceeds \$75,000.

### **NATURE OF THE CASE**

6. Ms. Jevremović has two sisters who have experienced mental health crises starting from their early twenties. As Ms. Jevremović helped to take care of her sisters, she became familiar with the difficulties of navigating the complexities to get the medical care for mental illness treatment, and to obtain health insurance coverage for inpatient and outpatient treatments.

7. As a result, Ms. Jevremović became inspired and decided to pursue a career in the management of mental illness, using what she has learned to help those who struggle with mental illnesses.

8. In 2019, Ms. Jevremović founded AURA to help individuals suffering through mental health crises, including addiction. AURA was founded to use technology to scale affordable, high-quality mental health treatment services. AURA intended to support mental health professionals using its proprietary technology to track the progress of people undergoing mental health treatment in various ways, inter alia, by recording and analyzing biometric data and providing the information to treatment providers from therapy sessions, connecting patients to therapists via telehealth, guiding users through grounding exercises and coping strategies, providing instructions in mindfulness and meditation, and using virtual reality (a.k.a. “VR”) to, *e.g.*, assist with exposure therapy, a technique guided by licensed therapists to extinguish an anxiety response. AURA also produced vitamins/supplements for brain health and mood support and has explored various other means of using technology to enable better health outcomes.

9. Ms. Jevremović made tremendous efforts to get AURA off the ground by, among other things, speaking at public and private universities and mental health forums.

10. One of Ms. Jevremović's appearances was on a series of videos produced for a YouTube Channel, Soft White Underbelly ("SWU"), run by Mark Laita, a commercial photographer.

11. Mr. Laita interviews "people who are frequently invisible in society—the unhoused, the sex worker, the chronic drug user, the runaway, the gang member, the poor and the sick."<sup>1</sup>

12. In or around July 2020, Ms. Jevremović first appeared on SWU in an interview to discuss her connection with mental health and the company she founded – AURA.

13. Due to Ms. Jevremović's efforts, AURA developed a community of adherents, and it succeeded in garnering an initial round of investor funding for its development and launch. By or around March 2022, AURA has received \$1.5 million investment and was valued at \$10 Million dollars.

14. Through AURA, Ms. Jevremović supplied mental health assistance tools to clinics and ambulatory facilities, free of charge, in order to receive feedback, refine her tools, and develop a viral, word-of-mouth buzz surrounding the product. To that end, AURA had previously provided some services without charge to certain celebrities, influencers, and persons in the public eye—as well as individuals with no public presence as a community social service. AURA was a burgeoning startup, until Ms. Courville began to leverage the "That Surprise Witness" treatment against Ms. Jevremović and AURA.

15. Ms. Courville is a New Jersey attorney, licensed in 2021 after graduating from The University of Pennsylvania School of Law in 2020. Ms. Courville worked at Winston Strawn LLP, briefly, before she and the firm parted ways over Ms. Courville's use of social

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<sup>1</sup> [https://en.wikipedia.org/wiki/Soft\\_White\\_Underbelly\\_\(YouTube\\_channel\)](https://en.wikipedia.org/wiki/Soft_White_Underbelly_(YouTube_channel)) (Accessed October 11, 2024.)

media. Ms. Courville describes her profession on her LinkedIn Profile as “Legal Commentary on YouTube/Social Media Law.”

16. On or about September 20, 2021, Ms. Courville formed “That Surprise Witness TV LLC.”

17. Ms. Courville hosted many of her broadcasts through one of her YouTube Channel, That Surprise Witness TV.<sup>2</sup>

18. Beginning in February 2022 and through to date, Ms. Courville has posted hundreds, if not thousands, of videos or Instagram posts defaming Ms. Jevremović.

19. A large number of Ms. Courville’s dedicated followers, people who call themselves “that Surprise Army,” have heard Ms. Courville’s calls to “make noise,” and have targeted, harassed, doxed, and cyberstalked Ms. Jevremović, and everyone and everything associated with Ms. Jevremović.

20. Ms. Jevremović’s life has been turned upside down by Defendants’ videos and posts, as well as the relentless harassment, doxing, and cyberstalking by Ms. Courville and her followers.

21. As a result of the wrongful conduct of Ms. Courville, Ms. Jevremović has lost “everything.”

22. AURA became defunct after Ms. Courville started publishing defamatory statements, and eventually, had to be closed around February 2024, because investors were not willing to invest in AURA and no longer was generating sufficient revenue from the sales of supplements.

23. As a result of Ms. Courville’s wrongful acts, Ms. Jevremović has been unable

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<sup>2</sup> <https://www.youtube.com/@ThatSurpriseWitness> (Accessed October 11, 2024.)

to find consistent employment, because potential employers have been dissuaded from hiring her because any Google search reveals Ms. Courville's false and defamatory statements.

24. Ms. Jevremović's mother lost her job as a Software Engineer, after thousands of people used the information released by Ms. Courville to harass Ms. Courville's mother and make calls to her employer.

25. Ms. Jevremović's husband has also been the target of Defendants' social media campaigns. Ms. Courville published Mr. Jevremović's and his family's information through her platforms, resulting in the harassment of Mr. Jevremović and his family. As of October 2024, Mr. Jevremović and Ms. Jevremović are in the process of finalizing their divorce – yet another result of Defendants' wrongful conduct.

#### **ALLEGATIONS COMMON TO ALL CAUSES OF ACTION**

26. In July 2020, Ms. Courville began to affiliate herself with the "Free Britney" movement, which criticized the institution of a conservatorship on celebrity-musician Britney Spears. Ms. Courville used variants of the handle "That Surprise Witness" across her social media accounts. Ms. Courville reported becoming "obsessed" and using her newfound "legal expertise" to interpret the associated law, pleadings, and court opinions and orders. She spread information online via videos, photos, and text commentary. As the "Free Britney" movement gained mass media attention, Ms. Courville was invited to give interviews as an attorney. Ms. Courville gathered hundreds of followers and viewers during the time that she gave commentary in connection with the Britney Spears conservatorship.

27. However, after Britney Spears' conservatorship was terminated, Ms. Courville began to receive less attention and had fewer followers and viewers across her various "That Surprise Witness" social media handles. With her followers/viewers in the mere hundreds following the end of the Spears conservatorship, Ms. Courville needed to look for other

celebrities and social media personalities that she could latch onto to build her own viewership and followers. Ms. Courville found the perfect combination of entities to tether “That Surprise Witness” to—with Mr. Margera (a celebrity), Ms. Jevremović (an entrepreneur with a social media footprint), and AURA.

**I. MS. COURVILLE SPREADS FALSE STATEMENTS REGARDING MS. JEVREMOVIĆ’S INVOLVEMENT WITH AMANDA RABB**

28. In or around late July, 2020, Ms. Jevremović appeared for an interview with Mr. Laita on SWU.<sup>3</sup> During that interview, Ms. Jevremović said that she was starting a scholarship program, through a nonprofit entity she formed, Jevremović Institute of Behavior and Brain Sciences (“JIBBS”), by which the recipient would receive one-year of mental health treatment (including detoxification), seven months of in-patient residential care, three months of full-time out-patient treatment while residing at a sober living facility, and two months of job placement training and reduced therapy to gradually integrate back into society as a productive, healthy member, free of charge.

29. At the end of that interview, Ms. Jevremović proposed that the first recipient of that scholarship would be one of the people that Mr. Laita had interviewed.

30. On or around August 1, 2020, Ms. Jevremović’s interview was released on SWU. Some viewers commented under that interview that they believed Amanda Rabb (“Ms. Rabb”) could be qualified as the first recipient.

31. Ms. Rabb was an unhoused, drug-addicted, woman residing in Los Angeles’ notorious Skid Row, who turned to sex work to fund her addiction. In or around July 2020, Ms. Rabb was in jail for assaulting her father, Larry Rabb.

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<sup>3</sup> <https://www.youtube.com/watch?v=b0twUppY6Z4&t=40s> (Accessed October 18, 2024.)

32. After having seen those comments, discussing the issues with Mr. Laita, and getting to know more about Ms. Rabb, Ms. Jevremović decided to select Ms. Rabb as the first recipient of the scholarship.

33. In or around August 2020, Ms. Jevremović started working with Mr. Rabb and Ms. Rabb's public defender to help Ms. Rabb obtain the treatment she needed for her substance abuse and mental illnesses.

34. In or around November 2020, the Court granted the petition for Ms. Rabb to receive treatment. The two treatment facilities where Ms. Rabb later received treatment, Hathaway Recovery Center and Desert Hope Treatment Center ("Desert Hope"), were not in any way owned or controlled by Ms. Jevremović. While Ms. Jevremović connected Ms. Rabb with those treatment centers, Ms. Jevremović and AURA did not, and could not, control the kind of treatment that Ms. Rabb received in the treatment centers.

35. Since AURA provided its products to the two treatment centers where Ms. Rabb received treatment, Ms. Rabb was also given the option to use AURA's products at no cost in conjunction with her treatment and therapy under the supervision of health care professionals. Ms. Jevremović personally funded the majority of Ms. Rabb's treatment, including drawing \$212,500 from a personal line of credit, supplemented by \$37,241 in donated funds.

36. Tragically, on Sunday, May 9, 2021, staff at Desert Hope, found Ms. Rabb unresponsive in her bed and unsuccessfully performed CPR. When an AURA employee contacted the Clark County Coroner's Office, requesting information regarding Ms. Rabb's death, Desert Hope relayed to AURA and Ms. Jevremović that Ms. Rabb only had Tylenol in her system—a fact that was verified by a representative of the Clark County Coroner, Dr. Paul



Uribe. Dr. Uribe added that Ms. Rabb's death resulted from natural causes, likely from multiple causes including physical trauma previously endured while abusing illicit substances and harm caused directly by the substances she had formerly abused. However, Ms. Rabb's formal autopsy report states that she died from cardiac arrhythmia with hypertension, obesity, and schizophrenia as contributing factors.

37. It is not a coincidence that Ms. Courville launched her campaign of lies and misinformation surrounding Ms. Rabb's tragedy, around the time that Ms. Jevremović became involved as a court-appointed guardian to seek to help Brandon Margera ("Bam" as he is referred to by fans, or hereinafter "Mr. Margera") in his fight with addiction.

38. Defendants' blitz of false statements regarding Ms. Jevremović and AURA, discussed in detail below, began in February 2022 and continued through today. While Defendants' social media blackmail effort began impugning Ms. Jevremović and AURA by making false suggestions that Ms. Jevremović had played some part in Ms. Rabb's cause of death, the media offensive expanded to accusing Ms. Jevremović of numerous additional humiliating falsehoods. Working Defendants' social media adherents – "That Surprise Army" – into a dangerous frenzy, the crusade escalated to dangerous cyber-harassment and doxing to intimidate Ms. Jevremović into, among other things, dropping this lawsuit and to gain clicks with fear mongering, which has increasingly crossed over from online commentary into real world effects that have caused a well-founded fear in Ms. Jevremović and her family for their personal safety.

39. When it comes to disseminating misinformation regarding Ms. Jevremović's and AURA's help with Ms. Rabb, Ms. Courville created a preconceived storyline. Ms. Courville initially claimed Plaintiffs conspired with Ms. Rabb's father, Larry Rabb, and Mr.

Laita, to put Ms. Rabb in jail. Ms. Courville further claimed that Ms. Jevremović and AURA conducted experimental treatment on Ms. Rabb, against Ms. Rabb's will. And, Ms. Courville claimed that Plaintiffs caused, and then lied about, Ms. Rabb's death.

40. Ms. Courville fabricated her eye-catching story by portraying everyone around Ms. Rabb as villains. She published the story through her social media platforms, including, but not limited to, the most viral video on her YouTube channel, called "Virtual Reality Hell: The Amanda Rabb Story,"<sup>4</sup> which was streamed live on July 21, 2022, and is still accessible online, today.

41. The video was published through her YouTube channel: BJ Investigates.<sup>5</sup> Ms. Courville describes her BJ Investigates Channel as follows:

BJ sets off to uncover the TRUTH behind some of the biggest scandals in History. No matter what that truth may hold...

42. Ms. Courville later made a series of videos under the name "Virtual Reality Hell: The Amanda Rabb Story" and posted them on both her channel of That Surprise Witness TV and BJ Investigates.

43. In a July 21, 2022 video, Ms. Courville's made numerous false accusations without any "panda ears or bunny ears" and without any props like the "sparkly unicorn pinata,"<sup>6</sup> appearing as:

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<sup>4</sup> <https://www.youtube.com/watch?v=xdfvYfuEUa> (Accessed October 14, 2024.)

<sup>5</sup> <https://www.youtube.com/@bjinvestigates> (Accessed October 11, 2024.)

<sup>6</sup> See <https://www.youtube.com/watch?v=xdfvYfuEUa> (Accessed October 10, 2024); see also <https://www.gofundme.com/f/facts-aint-defamation-fund> ("I am a lawtuber and independent journalist"); Cf. Court's August 10, 2023 Order at 13 ("In satirical spirit, Defendant can be seen wearing either panda ears or bunny ears while making her statements, while a sparkly unicorn piñata rests prominently in the background.")



44. In the video, Ms. Courville played a short excerpt of one of Ms. Rabb's six interviews with Mr. Laita, where Ms. Rabb had stated that her father was a molester.

45. While Ms. Courville showed a short excerpt from a later interview that Ms. Rabb had with Mr. Laita in April 2021, Ms. Courville chose not to disclose to her audience that Ms. Rabb stated during that very same interview, posted on April 19, 2021, that Ms. Rabb cleared her father's name.<sup>7</sup>

46. During a 12-minute interview with Mr. Laita, Ms. Rabb spoke fondly of her father, multiple times, including, but not limited to:

I mean I was tripping and the things that I accused my dad of in those videos is not true. I had schizophrenia. I had a mental illness where things I hear voices hallucinations all that. So my dad has done nothing to hurt me. He's a great guy. He's always been there for me and I really love him. So I just want to put that out there.

Yeah my dad we talk three times a day. I mean he's just such a great guy. I mean I can't wait to leave here. We're probably going to travel around the world together, that's just being sarcastic. But we're probably going to do a lot of fun things together because he's like my best friend now. We talk like three times a day.

And

I miss my dad. I love him so much. He's my rock honestly.

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<sup>7</sup> <https://www.youtube.com/watch?v=rt9OoLSavKM&list=PLBEIBBdgAOAoTfxs3dbbBIwM3FR7vNJQA&index=12> (Accessed October 15, 2024.)

47. Ms. Courville intentionally lied about, or at the very least recklessly disregarded, Ms. Rabb's relationship with her father, so that Ms. Courville could persuade her audience that Ms. Jevremović conspired with Mr. Rabb – who in Ms. Courville's viewers' eyes, is a molester – to put Ms. Rabb into jail.

48. Ms. Courville claimed, among other things:<sup>8</sup>

So by July, Lima already knew about Amanda, and was working in concert with Amanda's father who she called a molester, and Mark Laita who was paying her admittedly, knowing to go buy crack with. And they all conspired to make sure that Amanda went to jail.

49. Her statement was and is false. Ms. Jevremović first found out about Ms. Rabb only after Ms. Rabb was already in jail. Ms. Courville did not provide any basis for her accusation.

50. Ms. Courville further claimed, among other things:

Mark and Lima conspired to force her and it was easier to choose Amanda as the victim of this coerced treatment because they already had Larry Rabb.

51. Ms. Courville falsely claimed that Ms. Jevremović and AURA chose Ms. Rabb to be the subject of AURA's experimental treatment, with the cooperation of Mr. Rabb, whom Ms. Courville portrayed to her audience as a molester.

52. Ms. Courville additionally claimed, among other things:

Lima didn't tell the truth. Now we've caught her in two lies so far on the timeline. First of all, that the audience was somehow gonna help pick Amanda... Amanda was hand chosen because they had the cooperation of Larry Rabb. You need a family member.

53. Ms. Courville intentionally hid from her audience, or recklessly disregarded the truth that Mr. Laita specified that he recommended Ms. Rabb to be as the recipient of the

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<sup>8</sup> <https://www.youtube.com/watch?v=xdfvYfuEUaA> (Accessed October 14, 2024.)

scholarship program, due to Ms. Rabb's history, during his interview with Ms. Rabb on April 19, 2021:<sup>9</sup>

Mr. Laita: Well all all I can say is Lima is an amazing woman. Ms. Rabb: She is.

Mr. Laita: Because when she asked me who would I recommend for my chan. She wanted to do something for my channel. She would do this for and I recommended, you know, like you know maybe five or ten people.

Ms. Rabb: Yeah.

Mr. Laita: They would all have been good candidates but I said "or you can choose the hardest of all..."

Ms. Rabb: Right.

Mr. Laita: Which was you.

54. Ms. Courville further stated:

I operate in one absolute thing and that is truth. Lima didn't tell the truth.

55. Defendants' audience believed in Defendants' fabricated story as truth, and praised Defendants for discovering the truth:



@thedalllama3143 1 year ago

Lima and her company "AURA" is a SCAM. She reminds me of the narcissistic "conservator" in the 2020 movie "I Care A Lot," who ends up attempting to scam the wrong old lady. All 3 of these people are monsters who helped to end Amanda Rabb.

👍 309 💬 Reply



@teetee996112 2 years ago

BJ is calling out people who profit off of the suffering of others and deserves far more respect for her work

👍 1.6K 💬 Reply



@kbonvie 2 years ago

Look how panicked Lima looks at the part where Mark said he had been trying to put Amanda in a conservatorship!!! The timeline is everything. Great job BJ Investigate team

👍 300 💬 Reply

^ 2 replies



@kbonvie 2 years ago

\*Larry not Mark

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<sup>9</sup> <https://www.youtube.com/watch?v=rt9OoLSavKM&list=PLBEIBBdgAOAoTfxs3dbbBIwM3FR7vNJQA&index=12> (Accessed October 15, 2024.)

56. On or about March 29, 2022, Ms. Courville, in her video called “Bam Margera Conservatorship | \$HOCK!NG UPDATES,” stated that Ms. Jevremović instructed Mr. Rabb to call the police and have Ms. Rabb arrested. Ms. Courville falsely called both Ms. Rabb’s arrest and Mr. Margera’s arrest in Florida a “setup,” and claimed that Ms. Jevremović conspired with others in both instances to force both Ms. Rabb and Mr. Margera into a conservatorship. Specially, Ms. Courville claimed:<sup>10</sup>

Now if y'all remember, what happened with Amanda in the Soft White Underbelly video, this that case is related to this one ***because Lima is involved in both of them***. So how did they get Amanda in jail in that Soft White Underbelly case? Well, she attacked her dad, which they could be all lying about that, I didn't see that. Did y'all see Amanda attack her dad? Because I didn't. But allegedly Amanda attacked her dad and then her dad calls Mark Laita, the produce the YouTuber, Soft White Belly YouTuber and photographer. The dad calls and says hey Amanda just attacked me what should I do. ***On Lima's suggestion***, Mark Laita said you should call the cops and get her arrested. ***Once Amanda was arrested, they put her into a conservatorship and put her forced her into rehab***. So let's see if this looks familiar.

(emphasis added).

57. Defendants made the above statements, and other defamatory statements, with actual malice. During the April 19, 2021 interview, that Ms. Courville referenced and cited to in her own video, Mr. Laita said to Ms. Rabb and the audience:<sup>11</sup>

so so you, I think assaulted your dad and your dad called me that one night and said, “what do I do Amanda just assaulted me the police are here.” And I said, I told your dad like, just put her in jail. She’s going to walk the streets barefoot and and probably get killed eventually so putting her in jail for a month or two isn't gonna hurt her. So that's you went to jail and then from jail you went the court decided that you needed to do rehab for one year.

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<sup>10</sup> <https://www.youtube.com/watch?v=dYqBXwmKLxY> (Accessed October 15, 2024.)

<sup>11</sup> <https://www.youtube.com/watch?v=rt9OoLSavKM&list=PLBEIBBdgAOAoTfxs3dbbBIwM3FR7vNJQA&index=12> (Accessed October 15, 2024.)

To which Ms. Rabb responded: “Right.”

58. Mr. Laita did not mention Mr. Jevremović, whatsoever, in making the decision to put Ms. Rabb in jail. And Ms. Courville knew of it.

59. On March 30, 2022, Ms. Courville published on Instagram an excerpt of a YouTube video<sup>12</sup> in which Ms. Jevremović and Mr. Rabb, Amanda Rabb’s father, described how they managed to transfer Ms. Rabb from jail to a drug rehabilitation facility through the use of Court Ordered Treatment under California law. Pausing and speaking over the video at the one-minute and fifteen-second timestamp, Ms. Courville stated that Ms. Rabb’s public defender is not supposed to: “help you push your scam conservatorship through.”

60. On April 26, 2022, Ms. Courville published on Instagram a screenshot<sup>13</sup> showing the “GoFundMe” donation page for Ms. Rabb’s treatment, which then indicated that no new donations would be accepted. Ms. Courville commented on the photo with the statement:

Thanks for taking down your fraudulent fundraiser Lima!

61. On April 25, 2022, Ms. Courville published on Instagram a screenshot<sup>14</sup> showing that the “Donate now” button was still present on the “GoFundMe” donation page for Ms. Rabb’s treatment. Ms. Courville commented:

can you return the funds that have been fraudulently collected from donors on this fundraiser?

...

many people have reported this fraudulent fundraiser and your organization has taken no action.

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<sup>12</sup> <https://www.instagram.com/p/CbvTro1JLYk/> (Accessed October 15, 2024.)

<sup>13</sup> <https://www.instagram.com/p/Cc1UinJsWvQ/> (Accessed October 21, 2024.)

<sup>14</sup> <https://www.instagram.com/p/CcxeH1hOK1d/> (Accessed October 21, 2024.)

Elsewhere, Ms. Courville stated that:

we've reported [fraud] a lot

62. Ms. Courville's viewers believe Ms. Courville's false accusations and multiple viewers have commented, among other things, that:



**sarahmac406** 129w

I can't say I'm surprised. This woman is a criminal and a con artist. It makes me sick that this is happening

4 likes Reply ...

and



**sadouletthoff** 129w

That's criminal.....

6 likes Reply

63. Ms. Courville reiterated her accusations and false statements this in the same video, at 18:15, when she stated:

It's very serious, a woman is dead, a woman has passed under [Jevremović's] care.

64. On July 30, 2023, Ms. Courville published to YouTube a video titled "Missing Twin NEEDS Help | \*URGENT\*."<sup>15</sup> At 1:37 into the video, she stated:

Another story is the Amanda Rabb story and the fact that Lima did take over Amanda's life and healthcare in order to give her an experimental treatment and Amanda Rabb, as you know, did not survive the treatment. She passed away in the treatment center, in the AURA treatment center, and then Lima lied about how Amanda died and she never really gave a good explanation for that.

65. Later in the same video, at 10:55 she stated:

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<sup>15</sup> [https://www.youtube.com/watch?v=7d\\_8hiUYONQ](https://www.youtube.com/watch?v=7d_8hiUYONQ) (Accessed October 21, 2024.)



This has turned into a me versus everyone, everybody in the family, all the – no, it’s the truth versus lies.

66. Ms. Courville thus emphasized her statements as accurate and factual.

67. Ms. Courville also stated in the video, at 11:12:

Not only do we have one unexplained death that has happened in Lima’s care, we also now have allegations of sex trafficking of people that Lima has purported to be in care of, and Bam Margera told me himself he was held against his will for months without access to a phone, computer, internet, any of it.

68. On April 27, 2022, Ms. Courville published on Instagram an image<sup>16</sup> showing a digital message sent to her in which the message-sender criticized Ms. Courville for spreading falsehoods. An anonymous commenter asked,

When has Lima Jevremović [sic] . . . ever up held [sic] HIPPA [sic]?

69. Ms. Courville responded:

never not once [sic].

70. On April 27, 2022, Ms. Courville republished an image<sup>17</sup> containing another’s statements on Instagram regarding Ms. Rabb, Mr. Margera, and Ms. Jevremović; an anonymous commenter asked:

Are [Ms. Jevremović and AURA,] using homeless people with addictions to experiment on them for their [YouTube] channel?

and Ms. Courville unequivocally affirmed the commenter’s statement:

yes.

71. By affirming the commenter’s statement, Ms. Courville adopted the statement as her own.

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<sup>16</sup> <https://www.instagram.com/p/Cc22uuMsobQ/> (Accessed October 21, 2024.)

<sup>17</sup> <https://www.instagram.com/p/Cc3REs7FNGJ/> (Accessed October 21, 2024.)

72. On March 31, 2022, Ms. Courville published on Instagram an excerpt<sup>18</sup> from a video in which Ms. Jevremović read Rabb’s cause of death as a seizure disorder. Ms. Courville paused and added commentary, including, at 0:10 in the video:

Rabb never had seizures prior to being homeless.

Ms. Courville further commented and stated:

But I think another way of saying that is she never had seizures prior to using AURA.

73. Ms. Courville thus falsely stated that AURA’s products caused Ms. Rabb’s seizures.

74. On March 31, 2022, Ms. Courville published on Instagram a photo<sup>19</sup> of Ms. Rabb wearing virtual reality headgear and participating in a “Virtual Reality Exposure Therapy Session using AURA.” A person commented on the photo with interest in the virtual reality-based treatment, and Ms. Courville responded:

the issue is that Rabb was forced to do this treatment under threat of going to prison. She was set up against her will with the help of the government do be used as a test subject and marketing tool.

I agree with you completely that it ‘seems cool’. What’s not cool is taking away someone’s choice for their own treatment.

75. On April 1, 2022, Ms. Courville published an excerpt<sup>20</sup> from a program for a virtual reality conference which included Ms. Jevremović and her then-company, which worked with virtual reality in jail and prison settings. Ms. Courville commented on the image:

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<sup>18</sup> <https://www.instagram.com/p/CbxaISSgRxR/> (Accessed October 21, 2024.)

<sup>19</sup> <https://www.instagram.com/p/CbxIzVsOT-D/> (Accessed October 21, 2024.)

<sup>20</sup> <https://www.instagram.com/p/Cb02KZuAJEe/> (Accessed October 21, 2024.)

Seems like Lima has BEEN looking for a way to use experimental virtual reality apps on vulnerable populations that she views as ‘problematic’. #InvestigateAURA #FreeBam #AmandaRabb.

76. At least one commenter, danielle\_\_trotter, believed Ms. Courville’s comments, and responded:

This is so sick 🤢. She’s torturing people that are often ignored by society and disgusting it as “help”. It’s giving me old time my “insane asylum” vibes. Thank you for researching and casting light on this BJ. This is so heavy.

77. On March 30, 2022, Ms. Courville published another excerpt from a video<sup>21</sup> in which Ms. Jevremović described the use of AURA products in connection with Ms. Rabb’s treatment. Ms. Jevremović explained that AURA provides its products at no cost and uses the data collected for research purposes, and Ms. Rabb would have the opportunity to serve as a case study. Ms. Courville commented on the video:

Rabb did not consent to being used as a research object. She was court ordered into a conservatorship after Lima, mark Laita, and Rabb’s dad SET HER UP. This same woman petitioned to put Bam into a conservatorship. #FreeBam #AmandaRabb #InvestigateAURA

78. Defendants’ audience believed Ms. Courville’s false accusations and commented, for example:



ms.sarah.esq 132w

She sounds like another Elizabeth Holmes of Theranos touting fake technology, killing people with it, and getting away with murder because somehow she figured this shit out. What the absolute fuck.

1 like Reply ...

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<sup>21</sup> <https://www.instagram.com/p/CbvGodsJLtE/> (Accessed October 21, 2024.)

**freelizzieharding** 132w

PSYCHOPATHS. Sociopaths. The abuse of mental health and hygiene laws to enslave humanity.  
#WAKEUPEVERYONE.  
#freelizzieharding

**litigiousgrl** 132w

Disgusting, extremely reckless and dangerous...

Reply

**barbielluttman** 132w

This is so evil.

6 likes Reply

**gogogadgetadvocatechick** 132w

These pig tails are soooooo manipulative

12 likes Reply ...

79. On February 22, 2022, Ms. Courville published to YouTube a video<sup>22</sup> in which she defamed Ms. Jevremović and AURA. At 49:55 in the video, Ms. Courville falsely stated: [Jevremović] forces people by court order to use [AURA's] tools.

80. In fact, Ms. Jevremović and AURA did not have any control of the treatment Ms. Rabb received at the treatment centers, which Ms. Jevremović or AURA did not own or control. Ms. Courville knew her statement to be false and/or acted with reckless disregard for the truth or falsity of the statements.

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<sup>22</sup> <https://www.youtube.com/watch?v=hAPdBs398vc> (Accessed on September 5, 2023.) When accessed on October 14, 2024, the video is no longer available. It is hereby submitted that Defendants admitted that this video should not have been published because Ms. Courville removed the video at a later date.

81. While Ms. Courville claimed to publish nothing but the truth, she chose not to show to her audience that Ms. Rabb admitted during her April 19, 2022 interview with Mr. Laita that she had been clean of substance abuse for 10 to 11 months at that time, that the treatment she was receiving “really helped,” and what Ms. Rabb thought of Ms. Jevremović:

Ms. Rabb: I'm so glad you hooked us up with Lima. She feels like a mom. You know I never had my mom so it feels like such a blessing just to have her in my life, and just have you guys for support, because I really only have my dad so.

Mr. Laita: You couldn't pick somebody better than Lima.

Ms. Rabb: Yeah she's great. Lima's great.

82. Ms. Rabb further confirmed that “I'm blessed to have you and Lima. You guys are the best, like honestly.”

83. Defendants' so-called truths are directly contradicted by statements, including those from Ms. Rabb herself, that pre-dated any of the defamatory statements that Defendants made.

## **II. MS. COURVILLE SPREADS FALSE STATEMENTS REGARDING JEVREMOVIĆ'S INVOLVEMENT WITH MR. MARGERA**

84. Celebrity entertainer Mr. Margera and his wife, Nicole Boyd-Margera (“Ms. Boyd-Margera”), took an interest in AURA in the Winter 2020. Mr. Margera has starred in the blockbuster Jackass movies and popular television programs. Mr. Margera fought a longtime battle with substance abuse and witnessed numerous members of his inner-circle fight addiction over the previous two decades. Because of his background, Mr. Margera and Ms. Boyd-Margera initially sought to provide their support to Plaintiffs' efforts to rehabilitate addiction and improve related health outcomes. When Mr. Margera proved susceptible to multiple relapses in his battle with addiction, Mr. Margera's family approached Ms. Jevremović for intervention assistance.

85. When Mr. Margera's family and friends implored Ms. Jevremović to serve as Mr. Margera's temporary guardian, Ms. Jevremović agreed and took on the responsibility for overseeing Mr. Margera's treatment, which was put into effect by Court Order, with no connection to his financials or other aspects of his life. On or about June 7, 2021, an Arizona court imposed a one-year temporary guardianship over Mr. Margera in connection with his diagnosed medical issues. Indeed, despite the fact that the Ms. Jevremović was statutorily permitted to collect reasonable sums for her services as guardian, Ms. Jevremović was not reimbursed for funds she advanced for Mr. Margera's treatment and legal fees. Mr. Margera's father had been assisting Mr. Margera in managing his finances for many years at Mr. Margera's request, and Ms. Jevremović's appointment as a temporary guardianship did not touch upon Mr. Margera's money in any way.

86. After the court-ordered guardianship terminated, Mr. Margera requested that Ms. Jevremović continue to serve as his "Health Care Agent," a role in which she assisted Mr. Margera with his medical care related to his mental health treatment and recovery.

87. After learning that Ms. Jevremović was involved in Mr. Margera's recovery, Ms. Courville began publishing videos, photos, and text commentary regarding Mr. Margera, labeling her publications "#FreeBam," a reference to Mr. Margera's stage name, "Bam."

88. Ms. Courville began with baseless assertions that Mr. Margera's family and Ms. Jevremović manipulated a court-imposed guardianship as a tool to access Mr. Margera's assets, that Ms. Jevremović is committing and assisting in the commission of criminal acts, and that Ms. Jevremović is dishonest and promulgates lies.

89. Ms. Courville continued to publish videos, photos, and textual commentary in which she falsely accused Ms. Jevremović of criminal acts and dishonesty.

**A. Ms. Courville Published False Statements that Ms. Jevremović Was a Conservator and Was Able to Access Mr. Margera's Assets, With Knowledge of Their Falsity or a Reckless Disregard for the Truth or Falsity of Those Statements**

90. Defendants knew, or had a reckless disregard for the truth, that Mr. Margera was under guardianship, and not a conservatorship. Ms. Courville, who often touts her legal credentials, knew or should have known the difference between a guardianship and a conservatorship.

91. On or about February 9, 2022, Defendants published the following post on Instagram:<sup>23</sup>

Novak said Margera is currently 'in a programme', while Steve-O went on to explain that he is also under a 'guardianship'.

"It's not a conservatorship, it's a guardianship," he said.

"The conservatorship has financial implications, with a conservatorship they're in charge of all of your money and everything. With a guardianship, they kind of leave your money out of it, and the guardianship they're just like – there's rules you have to abide by and he's forced to be in."

92. Notwithstanding that the statements published by Defendants expressly stated, among other things, that Mr. Margera was under a guardianship, and that conservatorship has financial implications, while guardianship has not, Defendants commented, among other things:

Bam margera from jackass is in a conservatorship.

His so called friends are erroneously stating that guardianships and

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<sup>23</sup> <https://www.instagram.com/p/CZwgfgSFxJo/> (Accessed October 10, 2024.)

conservatorships are not the same thing. The so called friends are mistaken.

93. As correctly stated in the original post, above, in Arizona, a conservator's "first priority is to marshal and protect the assets of the conservatorship estate,"<sup>24</sup> while a guardian's responsibility is to "ensure that the ward is receiving appropriate medical care, proper education and their overall health and welfare is protected."<sup>25</sup> Such distinction is easily accessible on the website of Arizona Judicial Branch.<sup>26</sup>

94. Indeed, the training modules provided by Arizona Judicial Branch specifically provide, in relevant part: <sup>27</sup>

The law allows a guardian to handle money on behalf of the ward if there is no conservator appointed. In most instances, if the ward receives more than just Social Security income and has significant assets, such as a home, car or brokerage account, then the court will appoint a conservator. ***The Order to Guardian indicates that the guardian shall not manage more than \$10,000 on behalf of the ward.***

(emphasis added).

95. While being informed about the difference between guardianship and conservatorship, Defendants misrepresented the concepts with reckless disregard for the truth of their statements.

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<sup>24</sup> <https://supremestateaz.granicus.com/player/clip/2663?redirect=true> (Accessed October 14, 2024.)

<sup>25</sup> <https://supremestateaz.granicus.com/player/clip/2662?redirect=true> (Accessed October 14, 2024.)

<sup>26</sup> <https://www.azcourts.gov/educationservices/COJET-Classroom/Probate-Guardianship> (Accessed October 16, 2024.)

<sup>27</sup> <https://supremestateaz.granicus.com/player/clip/2662?redirect=true> (Accessed October 14, 2024.)



96. On April 19, 2022, Ms. Courville published an image<sup>28</sup> on Instagram containing a short conversation between Ms. Courville and a commenter. The commenter accurately stated:

[Mr. Margera is] not under a conservatorship[;] he's under a guardianship – big difference.

97. As recounted in the discussion of Mr. Margera above, he was subject to guardianship imposed in Arizona, and at no relevant time was a conservatorship been imposed. Nonetheless, Ms. Courville invoked her credentials, suggesting she holds expertise, and again provided an inaccurate interpretation of the law, and solicited viewers for her advertisement-supported videos:

are you a lawyer? Because I am. It's not different. It's exactly the same. Different states just call it different things. Please feel free to check out my Bam Mr. Margera playlist on YouTube for more info!

In response, a commenter remarked:

Every state is so different that I think these people use it to confuse people. I wonder if it would help if it was more uniform across the United States?

Ms. Courville, apparently drawing upon her self-avowed expertise, explained: “it’s to confuse people so the criminals can keep crim[e-]ing.”

98. When Defendants’ audience questioned the parameter of Ms. Jevremović’s duties as a guardian to Ms. Courville, who touted her background as a lawyer, Ms. Courville again made false statements regarding Ms. Jevremović’s role in the treatment of Mr. Margera, with reckless disregard for the truth of her statements, knowing that her audience viewed her as an authority to answer questions involving legal terms.

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<sup>28</sup> <https://www.instagram.com/p/CcibN0JOx89/> (Accessed October 14, 2024.)

99. For example, a user “courtcarls” commented:

Especially when it’s a lawyer who went to UPenn and knows their shit to the point that powerful people have tried to silence them! Sounds like a damned good lawyer to me 🙏

100. On or about June 24, 2022, Defendants published the “Order Appointing Emergency Temporary Guardian With Inpatient Mental Health Authority,” entered by the Superior Court of the State of Arizona, County of Maricopa. The Order, published by Defendants, included Ms. Jevremović’s Application to be appointed as a temporary guardian – the Application is not accessible to the public.<sup>29</sup> Notwithstanding that the Court Order specified that Bam was under guardianship, Ms. Courville posted under the Court Order, among other things:

EXCLUSIVE [@bam\\_margera](#) CONSERVATORSHIP COURT  
DOCUMENTS going live TODAY

101. Defendants published the statement with reckless disregard for the truth or falsity of it, to lay foundation for their preconceived story that Mr. Margera’s family and Ms. Jevremović manipulated a court-imposed guardianship as a tool to access Mr. Margera’s assets, even though Ms. Jevremović was not authorized to do so – a fact Defendants knew or acted in reckless disregard of the truth or falsity of such statement.

102. From June 22, 2022 to June 24, 2022, Ms. Courville published, no less than five (5) posts, on her Instagram, documents filed in the Superior Court of the State of Arizona, County of

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<sup>29</sup> [https://www.instagram.com/p/CfMCi1dOg51/?img\\_index=1](https://www.instagram.com/p/CfMCi1dOg51/?img_index=1) (Accessed October 10, 2023.)

Maricopa, in the matter captioned “In the Matter of the Guardianship of: BRANDON MARGERA.”<sup>30</sup>

103. The Guardianship and Conservatorships webpage of the Maricopa Court Website provides, as the first sentence on this webpage: <sup>31</sup>

A guardian is someone who has the legal authority to care for another, and a conservator is someone who manages another's financial affairs.

104. Ms. Courville publishes, until today, that Ms. Jevremović petitioned conservatorship for Mr. Margera, and as such, managed Mr. Margera's financial affairs, with knowledge of its falsity or a reckless disregard for the truth or falsity of those statements.

105. On March 30, 2022, Ms. Courville published to Instagram a screenshot<sup>32</sup> of comments made to Instagram, in which she stated, among other things, “[Lima] filed a petition to put him in a conservatorship in Florida...”

106. A commenter asked:<sup>33</sup>

Aleggedy [sic] right?

Ms. Courville responded:

no. This is documented on court records.

107. By responding to their audience's comment, Defendants reinforced the false and defamatory statements Defendants previously made.

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<sup>30</sup> See [https://www.instagram.com/p/CfH7x3rl\\_T0/?img\\_index=1](https://www.instagram.com/p/CfH7x3rl_T0/?img_index=1) (Accessed October 16, 2024.); [https://www.instagram.com/p/CfH9HOulAJw/?img\\_index=1](https://www.instagram.com/p/CfH9HOulAJw/?img_index=1) (Accessed October 16, 2024.); [https://www.instagram.com/p/CfH9ZSMlbye/?img\\_index=1](https://www.instagram.com/p/CfH9ZSMlbye/?img_index=1) (Accessed October 16, 2024.); [https://www.instagram.com/p/CfIEZqjDQ4\\_/](https://www.instagram.com/p/CfIEZqjDQ4_/) (Accessed October 16, 2024.); and [https://www.instagram.com/p/CfMCiIdOg51/?img\\_index=1](https://www.instagram.com/p/CfMCiIdOg51/?img_index=1) (Accessed October 16, 2024.).

<sup>31</sup> <https://superiorcourt.maricopa.gov/departments/superior-court/probate/guardians-and-conservatorships/> (Accessed October 14, 2024.)

<sup>32</sup> <https://www.instagram.com/p/CbvFUFAOuoU/> (Accessed October 14, 2024.)

<sup>33</sup> <https://www.instagram.com/p/CbvFUFAOuoU/> (Accessed October 14, 2024.)

108. A commenter asked:<sup>34</sup>

forced incarceration, experimenting on homeless & celebrity cash cows to fund her treatment centers? If im [sic] wrong on anything[,] please [let me know.]

Ms. Courville responded:

I mean... that's my impression, so if you're wrong[,] I am too.

109. Ms. Courville thereby explicitly adopted the commenter's false statements.

110. Ms. Jevremović does not engage in experiments on the homeless and has no treatment centers; further, the pejorative term "celebrity cash cows" implies that Ms. Jevremović is exploiting celebrities for money.

111. On April 3, 2022, Ms. Courville published an image<sup>35</sup> on Instagram, which purports to list biographical information about Mr. Margera, including his putative net worth (\$20 Million). Ms. Courville commented on the image:

According to @distractify, [Margera] is worth \$20 million. Now who would have an incentive to want to control that money and who would be in a position to do so 🤔🤔🤔 but what do I know I'm just a cOnSpIrAcY tHeOrIsT 😂😂😂😂 #FreeBam.

A commenter stated:

20 million now, soon to be much less, but it'll all be 'legit,'

to which Ms. Courville responded:

but a certain someone will have fresh lips, Botox, and a BBL watch.

To which the same commentator responded:

plus a vehicle, home, medical expenses, all necessary in order to fulfil duties.

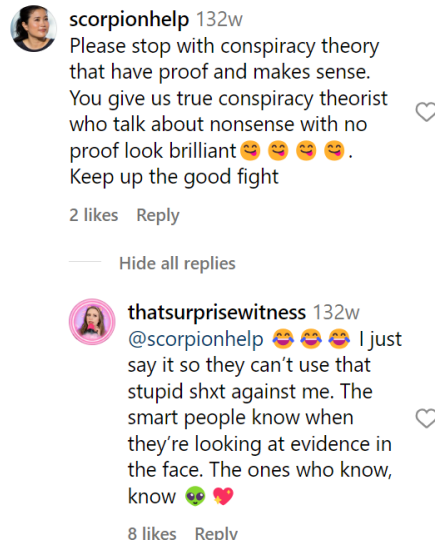
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<sup>34</sup> <https://www.instagram.com/p/CbvFUFAOuoU/> (Accessed October 14, 2024.)

<sup>35</sup> <https://www.instagram.com/p/Cb5b59wFxIg/> (Accessed October 16, 2024.)

112. Based on her other comments using the term “#FreeBam,” her audience would reasonably interpret Ms. Courville’s comments here to reference Ms. Jevremović— in fact, people did comment in response who understood the messages to reference Ms. Jevremović.

113. Under the post, Ms. Courville also admitted to her viewer that she only called it “conspiracy theory” to avoid legal responsibility, as follows:



114. On May 4, 2022, Ms. Courville published an image<sup>36</sup> on Instagram regarding Mr. Margera, to which she commented, in relevant part:

To clarify, I am a licensed attorney who believes [@bam\\_margera](#)'s constitutional rights have been violated. Based on my education, knowledge, and experience, he has been set up by ***a group of criminal co-conspirators for financial purposes*** not in bams best interest.

(emphasis added).

115. The statement was made is in furtherance of Ms. Courville’s defamatory statement that Ms. Jevremović was serving as a conservator, instead of a guardian, of Mr. Margera, and that Ms. Jevremović was able to touch upon Mr. Margera’s finances.

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<sup>36</sup> <https://www.instagram.com/p/CdJDkylMVl/> (Accessed October 14, 2024.)

116. The statement was published to Defendants’ audience, who believe in Ms. Courville’s credential as a licensed attorney who allegedly had conducted a thorough investigation of Mr. Margera’s “conservatorship” and her assertion that Ms. Jevremović was in total control of Mr. Margera, including his finances. A user “chili\_been” commented, among other things:

...You have since presented Extremely damning evidence that Bam is being taken advantage of by people who want control of his money...

To which another user “simplymonca” responded:

We feel those on team-con have been working hard to discredit BJ so they can keep their profits, whether they be monetary or credit for their own business ventures, or control so that they can do with him as they please.

117. A user, “rhinestone\_.artist0” praised Ms. Courville’s videos as “investigates [] so well done btw, amazing investigative journalism, with all the receipts,” and commented, among other things:

If I was in Bam’s situation I would want a lawyer like you that was going to fight for me. I guess this person is completely OK with Lima being in charge of his decisions.

118. A user, “pettyhearst,” commented thereupon stating:<sup>37</sup>

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<sup>37</sup> <https://www.instagram.com/p/CdJDkylMVI/> (Accessed October 14, 2024.)



pettyhearst 127w

I've been a Bam fan for 20 years, and his parents are good people who want the best for their son. While I personally believe conservatorships are never the answer and forced treatment is harmful, if it was just them in charge I would at least have peace of mind that there is no malicious intent. But they aren't in charge, Lima is, and she's a snake oil salesman with blood on her hands. She's clearly adept at manipulation, and I have no doubt she is manipulating Phil and April.

47 likes Reply ...

119. Ms. Courville published a reply directly to this statement expressing agreement: “bingo.”

**B. Defendants Continued to Publish Defamatory Statements Based on the False Foundation that Ms. Jevremović Can Access Mr. Margera's Assets**

120. On May 30, 2022, Ms. Courville published via Instagram the statement<sup>38</sup>:

Lima [Jevremović]. . . LIED ABOUT [AMANDA'S] CAUSE OF DEATH TO MILLIONS of people.

121. In the same statement, published alongside photos and videos of Ms. Jevremović at Disneyland with Mr. Margera and his family, Ms. Courville referred to Ms. Jevremović as a “handler[] and trafficker[].”

122. Defendants' viewers and audience demonstrated that they believed Ms. Courville's statements that Ms. Jevremović is a trafficker or criminal by commenting, among other things:

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<sup>38</sup> [https://www.instagram.com/p/CeMD\\_1Auo7L/?img\\_index=1](https://www.instagram.com/p/CeMD_1Auo7L/?img_index=1) (Accessed October 14, 2024.)



ryanbohac 123w

#investigatelima

#investigateloumtaylor

#investigateaura #freebam

3 likes Reply

123. On April 25, 2022, Ms. Courville published on Instagram an excerpt<sup>39</sup> from a Complaint previously filed by Mr. Margera against others affiliated with his television and film career. A commenter stated in response:

You discover so much more each days [sic] that goes by.. I don't trust any of them.. If this man does not come out of this [conservatorship,] they will eventually [k]ill him with prescription drug[s] or disguise street drugs as prescription drugs[,] who knows.. If [Britney Spears] would not be out of this[,] she would prob[ably] be de[a]d by now.. This man need[s] to be saved and free now.. #freebam.

In response, Ms. Courville stated: “the plan is to end his life. I’m convinced of it. #savebam.”

124. On April 19, 2022, Ms. Courville published on Instagram a screenshot<sup>40</sup> of a conversation between unidentified persons regarding Mr. Margera. Ms. Courville commented, describing “[L]ima [J]evremović” as an “alleged trafficker.”

125. One of Defendants’ viewers praised Ms. Courville’s post as “speaking truth, doing God’s work.”

126. On April 18, 2022, Ms. Courville published a screenshot<sup>41</sup> of a highlighted excerpt from an article discussing the application of Iceland law and whether Mr. Margera’s and his wife’s marriage is legally recognized. A commenter on the image asked:

where are his parents?

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<sup>39</sup> <https://www.instagram.com/p/CcxsX9HsR9H/> (Accessed October 16, 2024.)

<sup>40</sup> <https://www.instagram.com/p/CciJ3HsuFLX/> (Accessed October 14, 2024.)

<sup>41</sup> <https://www.instagram.com/p/Ccf9UdxuHYc/> (Accessed October 14, 2024.)



127. to which Ms. Courville responded, referring to Ms. Jevremović:  
helping the criminals [sic] girl.

128. On April 3, 2022, Ms. Courville posted a screenshot<sup>42</sup> of an excerpt of a celebrity tabloid article on Instagram, in which she highlighted a portion of the title stating, “Margera Used To Have A \$45 Million Net Worth”; Courville commented on the photo, saying:

I heard forced rehab is expensive... I learned that from Lima from @meetAURA. Who now has @bam\_\_margera in a forced rehab. WhT are the chances!! That’s just my conspiracy theory lol 🤪 #FreeBam.

129. By linking the cost of rehabilitation, as described by Ms. Jevremović, to the supposed depletion of Mr. Margera’s net worth, Ms. Courville falsely characterized Ms. Jevremović as depleting Mr. Margera’s money, rather than assisting with treatment for a substance abuse disorder.

130. The statement is also a continuation of Ms. Courville’s previous defamatory statements that Ms. Jevremović was Mr. Margera’s conservator, a role permitted by law to manage Mr. Margera’s finances, notwithstanding that Ms. Jevremović was a guardian.

131. Defendants’ audience believed Ms. Courville’s implication that Ms. Jevremović financially benefited from Mr. Margera’s guardianship. A viewer, officialbogwitch, commented, in relevant part: “It’s not unreasonable to think that Lima would also wanna sink her claws into his parents and manipulate them out of what little he has left.”

132. On April 4, 2022, Ms. Courville published to YouTube a video entitled “What Happened to Bam Margera? EXCLUSIVE POLICE REPORT”<sup>43</sup> in which she defamed Ms.

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<sup>42</sup> <https://www.instagram.com/p/Cb5djK4FXNI/> (Accessed October 14, 2024.)

<sup>43</sup> <https://www.youtube.com/watch?v=b3beCLgl6aw> (Accessed October 14, 2024.)

Jevremović. In the video, Ms. Courville claimed that Ms. Jevremović conspired with Steven Timmer and Mr. Margera's aunt, Antoinette Melissa Dompierre, a/k/a, Aunt Missy, to deceive Mr. Margera into flying to Florida, and then to have police arrive at the hotel that he was staying so that he could be escorted to a treatment center in Florida.

133. Ms. Courville made numerous false statements in that video, including, but not limited to, that Ms. Jevremović was present at the hotel when the police were called to the hotel to "setup" Mr. Margera's arrest.

134. In that video, Ms. Courville read to her audience an online article, titled "Bam Margera allegedly attacked woman while on cocaine, 911 call shows" published on Page Six, on October 13, 2021.<sup>44</sup> The article provided, among other things, that 911 was called because Mr. Margera allegedly assaulted a female, stating that "[Mr. Margera] attacked her, grabbed her breast, and she said she thinks he tore her implant." The article further provided that the 911 caller claimed that Mr. Margera was in the room with a prostitute and a "minder" when the alleged assault happened.

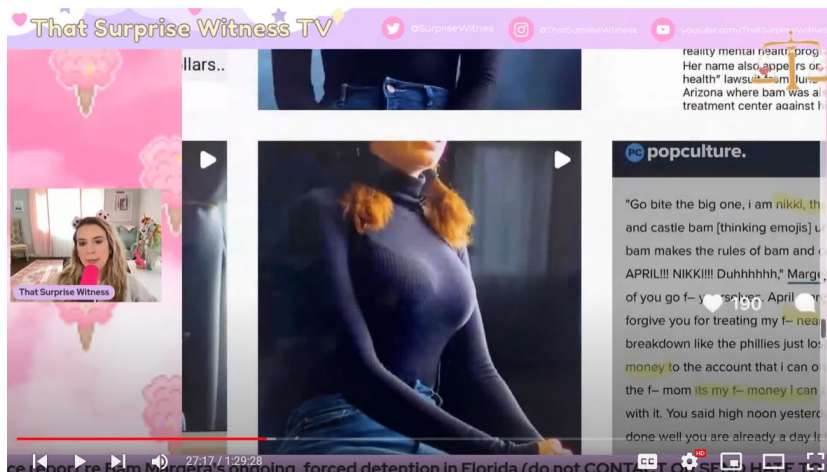
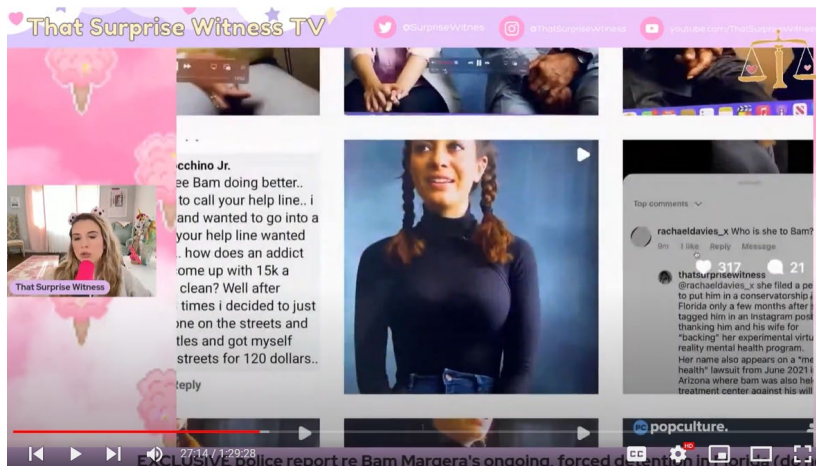
135. While reading the article to her audience, Ms. Courville stated:

Then he referenced the some alleged victim and says he attacked her, grabbed her body part and she thinks he tore her implant. Now I don't know who this alleged victim could be. I don't know who could possibly have implants. I don't know whose implant he could have been accidentally tearing, who maybe was trying to force him to go somewhere against their will. But it's all going to add up real soon...

136. While making the statements above, Ms. Courville clicked on two pictures of Ms. Jevremović, and zoomed in those two pictures, such as insinuating that Ms. Jevremović was the woman referred in the article:

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<sup>44</sup> <https://pagesix.com/2021/10/13/bam-margera-attacked-woman-while-on-cocaine-911-call-shows/> (Accessed October 14, 2024.)



137. Of course, Ms. Jevremović was in the State of Washington when the alleged assault occurred.

138. Furthermore, the article that Ms. Courville was reading from provided, in relevant part:

The caller described the alleged victim – whose name will not be disclosed out of discretion – as a white woman in her 50s or early 60s.

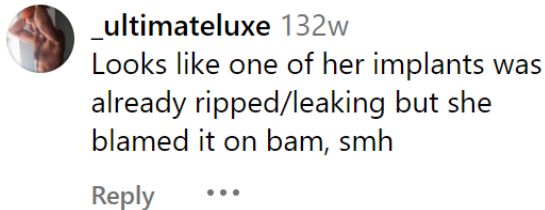
And

Bam was with his aunt in the hotel room. She is a 65-year-old woman, who is clean and sober...

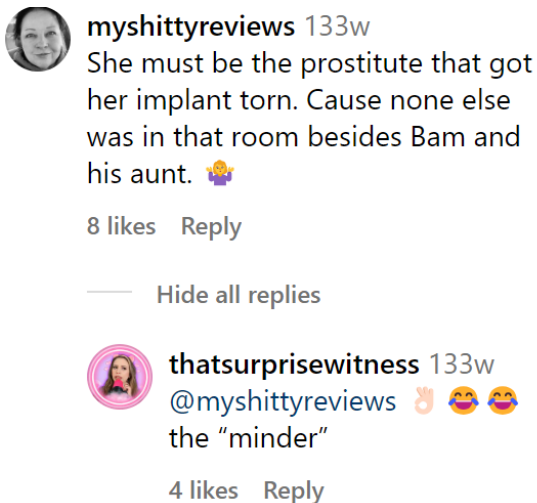
139. As such, it was plain from the article that Ms. Courville was reading from, that Ms. Jevremović, who was in her 30s, could not have been the alleged victim.

140. Ms. Courville, in making that statement, showed a reckless disregard of the truth or falsity of her statements.

141. Defendants' audience interpreted Ms. Courville's defamatory statements as the truth. A user, "ultimateluxe" commented under Ms. Courville's Instagram post of an excerpt in which Ms. Jevremović was wearing the same black sweater as in the two pictures that Ms. Courville zoomed in:<sup>45</sup>



142. Another user "myshittyreviews" commented under the same post:



143. Knowing that her statements were false, Ms. Courville did not correct any of the statements, but reinforced the false statements by replying to her audience to imply that

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<sup>45</sup> <https://www.instagram.com/p/CbvGodsJLtE/> (Accessed October 16, 2024.)

Ms. Jevremović was at the scene and was actually the “minder” in the room, as described by the 911 caller.

144. At 27:39 of the video, Ms. Courville described Mr. Margera’s transfers between treatment facilities and states:

Honestly, some of it looks criminal. Now I’m a lawyer, but what do I know. It looks criminal to me.

145. This statement defames Ms. Jevremović insofar as Ms. Courville repeatedly identifies Ms. Jevremović as responsible for Mr. Margera’s treatment, and insofar as Ms. Courville, invoking the authority she commands as a lawyer, describes aspects of Mr. Margera’s treatment as criminal.

146. The audience targeted by the video believed Ms. Courville’s statements, which aim to imply objective facts that are false – that Ms. Jevremović conducted criminal activity. For example, a viewer commented:<sup>46</sup>

Lima, when acting as guardian, unequivocally breached her fiduciary duty with the placement of Bam into a center that employs an interventionist with documented criminal behavior.

147. A viewer of another of Ms. Courville’s videos about Mr. Margera’s “conservatorship,” @JessicaC., commented:<sup>47</sup>

Damn BJ why aren't you practicing law? You need to be a lawyer! You have your degree! You would make an amazing civil rights lawyer! By the look of it a lot of individuals who are dealing with addiction and being trafficked around to different facilities need legal representation! You would be perfect for this! You found your calling!

To which Ms. Courville, again, touted her legal background:

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<sup>46</sup> <https://www.youtube.com/watch?v=b3beCLgl6aw> (Accessed October 14, 2024.)

<sup>47</sup> <https://www.youtube.com/watch?v=Cj6xVkd56tU&list=PLxoh8HZ0hbVHpC3RufJee77ZQkrxEOdRh&index=10> (Accessed October 16, 2024.)

I am a lawyer. That's how I know this stuff 😊❤️

And

I can make a LOT bigger difference doing stuff like this. I'm not meant to be an employee. Not my current path. But I do use my degree for civil rights! Just not the traditional way 😊

148. On July 8, 2022, Ms. Courville published to YouTube a video entitled [“Bam's Family Breaks Silence on #FreeBam | Jess and April Margera SPEAK OUT.”](#)<sup>48</sup> At 6:10, in the video she stated:

I do not say theories without being very explicit that it is my opinion or my belief or my suspicion. I never say anything as if it is a fact when I don't know it to be a fact.

149. Ms. Courville thus emphasized that her statements are accurate and factual even when they were not. At 15:59 of the video, Ms. Courville described herself as the woman who dared use her, volunteer her time to help [Margera] out of a literal human trafficking situation [.]

150. Audience of the video praised Ms. Courville as “such a good investigator” and spoke highly of Ms. Courville: “Your passion for truth is so refreshing!!” It is clear that Defendants’ audience interpreted Ms. Courville’s statements as truth, not hyperbole.

151. A viewer of the video commented:

Lima reminds me of that lady from the movie “I care a lot” that movie is about a woman becoming rich off of putting people in conservatorships and stealing their money or making money off of them.

152. Defendants’ audience believed Defendants’ continuous false and defamatory statements about Ms. Jevremović.

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<sup>48</sup> <https://www.youtube.com/watch?v=Nr3e0RKY6Ig> (Accessed October 14, 2024.)

153. On April 18, 2022, Ms. Courville posted a screenshot<sup>49</sup> of anonymous comments to Instagram, captioning the photo:

Looks like team con is planning to traffic @bam\_margera for a “few more months”. #freebam

154. On September 10, 2022, Ms. Courville published a video to YouTube entitled “Lima Jevremović Made A Video About Me,”<sup>50</sup> in which she stated at 17:53 of the video:

I joke about stuff, and I make light of situations, but like, make no mistake, this isn’t drama, this is very serious.

155. By the statement, Ms. Courville emphasized that her statements are not jokes or hyperbole but should be understood as accurate and factual.

156. Defendants’ statements became so prolific that any Google search of Ms. Jevremović or AURA reveals the false accusations and defamatory statements posted by Defendants.

157. Defendants directly disrupted AURA’s second round funding, causing potential investors actively involved in funding discussions to retreat.

158. Ms. Courville’s false and misleading statements about Plaintiffs have directly interfered with AURA’s business and caused damage to Ms. Jevremović, resulting in, among other things, order cancellations and the withdrawal of marketing affiliates.

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<sup>49</sup> <https://www.instagram.com/p/Ccf9opHlvNm/> (Accessed October 14, 2024.)

<sup>50</sup> [https://www.youtube.com/watch?v=RtwiHx8\\_oMA](https://www.youtube.com/watch?v=RtwiHx8_oMA) (Accessed October 10, 2024.)

### **III. DEFENDANTS' INTENTIONAL RELEASE OF PRIVATE INFORMATION AND ENCOURAGEMENT OF UNLAWFUL CONDUCT**

159. Ms. Courville has, at various times, published Ms. Jevremović's social security number,<sup>51</sup> date of birth, unlisted home phone number, and three of Ms. Jevremović's unlisted home addresses,<sup>52</sup> her family members' addresses, among many other information in a coordinated and intentional doxing campaign.

160. Additionally, Defendants' publication of Ms. Jevremović's sisters' addresses, resulted in putting Ms. Jevremović's sister, Dahlia, soon after the publication of her otherwise private address, in harms way.

161. After being besieged in their home in Washington State by Ms. Courville's devotees, where Ms. Courville encouraged followers to "make some noise" directed towards Ms. Jevremović, Ms. Jevremović and her family relocated to California for their safety and have hired a round-the-clock home security detail.

162. In or around August 2023, Defendants' "@thatsurprisewitness" handle on Instagram included a post with comments that included Ms. Jevremović's home address. Strangers began to appear near her front yard, lurking inexplicably, almost immediately upon the information being released on Defendants' "@thatsurprisewitness" Instagram handle. As a result, Ms. Jevremović had to relocate.

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<sup>51</sup> [https://www.instagram.com/p/CfMCi1dOg51/?img\\_index=2](https://www.instagram.com/p/CfMCi1dOg51/?img_index=2) (Accessed October 14, 2024). The Application for Appointment as Guardian posted by Defendants initially contained Ms. Jevremović's Social Security Number, unredacted. When accessed on October 14, 2024, Ms. Jevremović's SSN was redacted. As such, it is respectfully submitted that Defendants have admitted that posting Ms. Jevremović's SSN is unlawful by redacting the SSN later.

<sup>52</sup> See, e.g., <https://www.instagram.com/p/Cvm7JP5ABLB/?hl=en> (Accessed September 6, 2023) When accessed on October 14, 2024, there is no longer publication of Ms. Jevremović's addresses under the post. It is hereby submitted that Defendants admitted that Ms. Jevremović's addresses should not have been published because Ms. Courville removed them at a later date. See also [https://www.instagram.com/p/CfMCi1dOg51/?img\\_index=2](https://www.instagram.com/p/CfMCi1dOg51/?img_index=2) (Accessed October 10, 2024).



163. There was a video that urged Ms. Courville’s followers to “make some noise,” after arming her followers with Ms. Jevremović’s mother’s home address, phone number, and airing a humiliating mental health crisis video—a video that Oklahoma authorities have indicated should not have been available to the public.<sup>53</sup>

164. As a result of Ms. Courville’s doxing campaign, Ms. Jevremović’s mother lost her job as a Software Engineer, after thousands of people used the information released by Ms. Courville to harass Ms. Jevremović’s mother and make calls to her employer.

165. A collection of fans and Defendants’ online supporters participated in private virtual meetings, and called themselves “That Surprise Army.” At least one former dedicated member of That Surprise Army declared, under oath, that members of That Surprise Army had a discord server called That Surprise Army that had over 10,000 pieces of information about Ms. Jevremović and everyone she knew, including estimates and timelines of when Ms. Jevremović met certain people and where Ms. Jevremović was located.

166. According to that former member, the That Surprise Army believed that they were fighting for justice and gathered on the server to investigate Ms. Jevremović and her family on behalf of Defendants.

167. Ms. Courville communicated with her followers and encouraged them to “do their own research” while sharing private information with her followers about Ms. Jevremović and her family. Indeed, Defendants’ numerous social media posts, videos, and directives, led Defendants’ followers to believe that Ms. Jevremović was involved in criminal activities as Ms. Courville claimed.

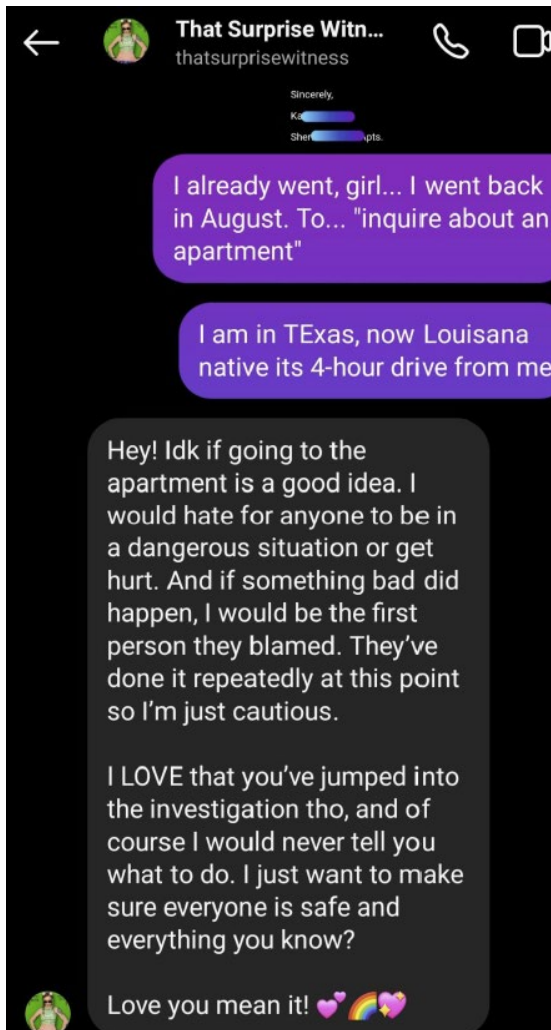
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<sup>53</sup> <https://www.youtube.com/watch?v=CLiFEyC0WK8> (Accessed September 5, 2023). When accessed on October 14, 2024, the video is no longer available. It is submitted that Defendants have admitted that the video should not have been published because Ms. Courville has not removed it.

168. Feeling compelled to assist Ms. Courville, no less than one member obtained Ms. Jevremović's mother's address, from a video published by Ms. Courville in which she also detailed Ms. Jevremović's sister's private medical information.

169. In one of her videos containing the police intervention crisis footage, Ms. Courville persuaded thousands of her viewers that Ms. Jevremović's sister urgently required rescue from her own mother and from Ms. Jevremović.

170. In or around late 2023 or early 2024, that former member of That Surprise Army reached out to Ms. Courville privately via a direct message ("DM"), informing Ms. Courville that she had gone to the home of Ms. Jevremović's mother to look into the accusations and Ms. Courville responded by stating:



171. Defendants' viewers believed they were doing the right thing because Ms. Courville claimed to be an attorney that knows the law and is advising her audience on what they are legally allowed to do to bring justice to "powerful criminals."

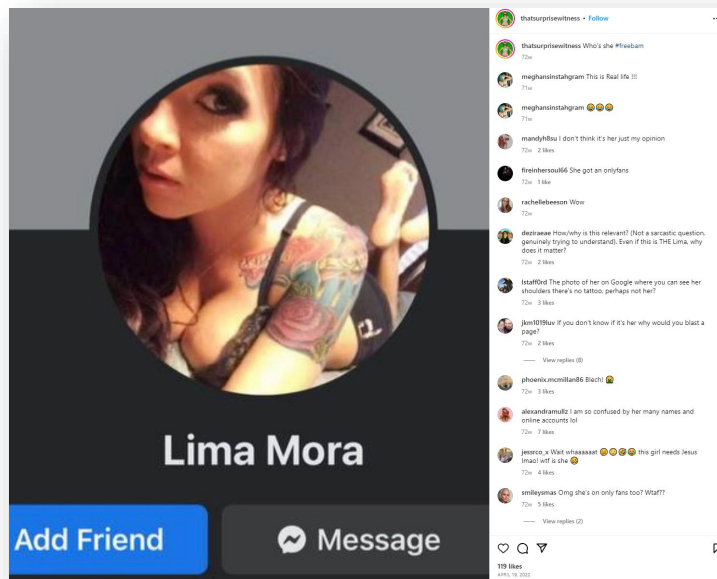
#### IV. ACTUAL MALICE

172. Ms. Courville made and published each of the many false statements with the knowledge that the statements were false when made, and/or with reckless disregard for the truth or falsity of the statements.

173. Ms. Courville touted her background as a lawyer, and advised her many viewers and listeners that her many false and defamatory statements should be believed because she

has made the statements based on her “education, knowledge, and experience.”<sup>54</sup> Ms. Courville has posted, among other things, her Attorney ID, and Bar Admission Date in the State of New Jersey.<sup>55</sup> She has touted to her audience that she “graduated from Ivy League law school.”<sup>56</sup>

174. In addition to the many false and defamatory statements described above, in one especially intentionally humiliating post made on April 19, 2022, Defendants published a photograph<sup>57</sup> on the @ThatSurpriseWitness Instagram page, which appeared to be a screenshot of a female’s account, whose name is “Lima Mora,” as below:



<sup>54</sup> May 4, 2022 Instagram Post, at <https://www.instagram.com/p/CdJDkylMVl/> (Accessed October 10, 2024.) (“To clarify, I am a licensed attorney...”.)

<sup>55</sup> <https://www.instagram.com/p/Cf4a8lolr1N/> (Accessed October 10, 2024.)

<sup>56</sup> [https://www.instagram.com/p/Cf4brvtlxV0/?img\\_index=1](https://www.instagram.com/p/Cf4brvtlxV0/?img_index=1) (Accessed October 10, 2024.) (“that time I graduated from Ivy League law school.”).

<sup>57</sup> [https://www.instagram.com/p/CciejDiFsTl/?utm\\_source=ig\\_web\\_copy\\_link&igshid=MzRIODBiNWFIZA==](https://www.instagram.com/p/CciejDiFsTl/?utm_source=ig_web_copy_link&igshid=MzRIODBiNWFIZA==) (Accessed October 10, 2024.)

175. Since Defendants posted this picture amid their efforts to vilify Ms. Jevremović, Defendants' viewers immediately realized that Ms. Courville was saying that the female in the picture is Ms. Jevremović.

176. Various viewers of the post also pointed out that the picture shows an OnlyFans account, and commented, for example:

Omg she's on only fans too? Wtaf??

She got an onlyfans.

And

Looks like only fans acct.

177. Defendants' viewers reasonably interpreted Defendants' post as Defendants telling their viewers that Ms. Jevremović has an OnlyFans account.

178. Ms. Courville furthered her campaign against Ms. Jevremović by including the false statement that Ms. Jevremović is involved in pornography, without any conceivable legitimate purpose to say so except to harass and cause harm to Ms. Jevremović's reputation.

179. After more than three years of Defendants' thousands of postings about Ms. Jevremović and AURA, the top search engine results for Ms. Jevremović and AURA are now almost all Defendants' false and otherwise intimidating social media content.

180. At the same time, Defendants' videos regarding Ms. Jevremović make up more than half of Ms. Courville's top ten most viewed videos, from which it can be inferred that Ms. Courville has operated with the awareness of the economic potential from distributing falsehoods about Ms. Jevremović.

181. To date, Defendants are continuing their defamatory statements against Plaintiffs. Ms. Courville stated to her audience, through a video streamed on June 27, 2023:

they're going to sue me for telling the truth, you better not have no skeletons in your damn closet. You better not have a single femur bone in your closet because I'm gonna find it. Oh yes I am. Stuff you never ever thought that I was gonna find I'm gonna find it and then if I find it and it was public which almost every single thing I ever find is public I'm gonna tell every damn person about it who will listen. Yes, I will. Do not sue me for telling the truth bitch! I bet you learned your lesson now! Didn't you? So, long story short I've spent the greater part of the last two weeks probably 10 to 15 hours a day searching every single possible nook and cranny—not only of the internet but of the physical field of reality in order to find every single skeleton, every femur, every skull, every kneecap, every pinky toe bone...

182. Defendants know that what they are disseminating is false. Defendants are betting that they can say false and defamatory statements without repercussions.

### **FIRST COUNT**

#### **Libel**

#### **(By Plaintiff Lima Jevremović against All Defendants)**

183. Plaintiffs incorporate the allegations set forth above in Paragraphs 1 through 182 as though fully set forth in this paragraph.

184. Defendants published defamatory statements of and concerning Ms. Jevremović, including, but not limited to the false statements referenced in Paragraphs 26 to 182, above.

185. Defendants published to the public, including but not limited to their many viewers, these false statements through their social media channels.

186. All of Defendants statements are false and/or made with reckless disregard for the truth or falsity of these statements.

187. Ms. Jevremović's reputation and business endeavors have been negatively impacted, if not destroyed, by Defendants' statements. She has suffered humiliation, emotional distress, anger, embarrassment, frustration, fear, loss of income, severe anxiety,

stress, shame, mortification, sleeplessness, and other physical manifestations thereof resulting from Defendants' above-described actions.

188. Defendants intentionally and maliciously made the false and defamatory statements, referenced in Paragraphs 26 to 182, above, since February 2022, in an attempt to benefit themselves by gaining more online attention and compensation for more views on their social media publications.

189. Defendants published their statements with the knowledge of the falsity of those statements or a reckless disregard for the truth or falsity of these statements, and thus, Defendants acted with actual malice sufficient to support an award of punitive damages.

190. Defendants false and defamatory statements, including but not limited to those statements referenced in Paragraphs 88, 89, 114, 121, 122, 124, 144, 145, 146, 174-175, and 178, constitute libel *per se*.

191. As a direct and proximate result of Defendants published false and defamatory statements to third parties about Ms. Jevremović, which they knew to be false and/or acted in reckless disregard of the truth or falsity of those statements, Ms. Jevremović has been and continues to be damaged.

## **SECOND COUNT**

### **Libel**

#### **(By Plaintiff AURA against All Defendants)**

192. Plaintiffs incorporate the allegations set forth above in Paragraphs 1 through 191 as though fully set forth in this paragraph.

193. Defendants published defamatory of and concerning AURA, including, but not limited to the false statements referenced in Paragraphs 26 to 182, above.

194. Defendants published to the public, including but not limited to their many viewers, the false statements through their social media channels.

195. All of Defendants statements are false and/or made with reckless disregard for the truth or falsity of these statements.

196. AURA's reputation has been negatively impacted due to Defendants' above-described actions; AURA has lost substantial investments, opportunities, and income and AURA and its CEO, Ms. Jevremović, have been exposed to hatred, contempt, and the loss of the goodwill and confidence felt toward them by others, because of Defendants' libelous statements.

197. Defendants intentionally and maliciously made the false statements referenced in Paragraphs 26 to 182, above, over several months in an attempt to benefit themselves by gaining more online attention and compensation for more views on their social media publications.

198. Defendants published their statements with knowledge of the falsity of those statements or a reckless disregard for the truth or falsity of those statements, and thus, Defendants acted with actual malice sufficient to support an award of punitive damages.

199. As a direct and proximate result of Defendants publishing false and defamatory statements about AURA, which they knew to be false and/or acted in reckless disregard of the truth or falsity of those statements, AURA has been and continues to be damaged.

### **THIRD COUNT**

#### **Invasion of Privacy – Intrusion upon Seclusion**

**(By Plaintiff Lima Jevremović against All Defendants)**

200. Plaintiffs incorporate the allegations set forth above in Paragraphs 1 through 199 as though fully set forth in this paragraph.



201. Defendants intentionally intruded upon Ms. Jevremović's seclusion by, among other things, intentionally releasing personal information without any permission to do so, and to the contrary, over Plaintiff's vehement objections.

202. Specifically, Defendants published personal and private information regarding Ms. Jevremović and her family, including Ms. Jevremović's family's home addresses, the name and address of the church Ms. Jevremović attends in Los Angeles, Ms. Jevremović's phone number, Ms. Jevremović's social security number,<sup>58</sup> as well as the names and photos of Ms. Jevremović's husband, sisters, mother, and mother-in-law.

203. Defendants' intentional release of Ms. Jevremović's social security number to her viewers, alone, constitutes a violation of N.J.S.A. §58:8-164.

204. Moreover, Defendants' release of Ms. Jevremović's personal information and encouragement of Ms. Courville's followers to act on that information,<sup>59</sup> has caused further intrusions and invasions into Plaintiff's privacy via death threats and text messages of dead bodies from unknown numbers, strangers showing up uninvited and unannounced at Ms. Jevremović's home, and drones entering and surveilling Ms. Jevremović's property to watch Ms. Jevremović and her family.

205. The public has no legitimate interest in learning of Ms. Jevremović's personal and private information and the publication of Ms. Jevremović's personal and private information would be highly offensive to a reasonable person.

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<sup>58</sup> [https://www.instagram.com/p/CfMCi1dOg51/?img\\_index=2](https://www.instagram.com/p/CfMCi1dOg51/?img_index=2) (Accessed October 14, 2024). The Application for Appointment as Guardian posted by Defendants initially contained Ms. Jevremović's Social Security Number, unredacted. When accessed on October 14, 2024, Ms. Jevremović's SSN was redacted. As such, it is respectfully submitted that Defendants have admitted that posting Ms. Jevremović's SSN is unlawful by redacting the SSN later.

<sup>59</sup> June 27, 2023 YouTube video with Ms. Courville touting the contributions of her followers to her activities in digging into Jevremović's personal life: <https://www.youtube.com/watch?v=Vh6j4YHIxoE>.

206. As a direct and proximate result of Defendants' wrongful conduct, Ms. Jevremović has suffered and continues to suffer emotion and financial harm.

#### **FOURTH COUNT**

##### **Invasion of Privacy – False Light**

**(By Plaintiff Lima Jevremović against All Defendants)**

207. Plaintiffs incorporate the allegations set forth above in Paragraphs 1 through 206 as though fully set forth in this paragraph.

208. Defendants exposed Ms. Jevremović in a false light, by making defamatory statements about Ms. Jevremović's character, history, activities and beliefs.

209. Defendants either knew that the publicized material was false and would place Plaintiffs in a false light or acted with reckless disregard as to whether the publicized defamatory statements were false and/or with reckless disregard for the false impression created by the publicized defamatory statements.

210. The defamatory statements made by Defendants so misrepresented Ms. Jevremović's character, history, activities, and/or beliefs that a reasonable person in Plaintiff's position would find the material highly offensive.

211. As a direct and proximate result of Defendants' wrongful conduct, Ms. Jevremović has suffered and continues to damages.

#### **FIFTH COUNT**

##### **Intentional Infliction of Emotional Distress**

**(By Plaintiff Lima Jevremović against Defendant Brittany Jeream Courville)**

212. Plaintiffs incorporate the allegations set forth above in Paragraphs 1 through 211 as though fully set forth in this paragraph.

213. Ms. Courville's distribution of Ms. Jevremović's home address, her mother's home address, and myriad other releases of private information, including Ms. Jevremović's phone number and social security number, with the aim of inflicting devastation and emotional distress on Ms. Jevremović and her family - and that Ms. Courville's actions did in fact cause devastation and emotional distress.

214. Ms. Jevremović has suffered, and continues to suffer, emotional distress as a result of Defendants' wrongful conduct. She regularly sees a psychiatrist and a therapist. In April 2024, Ms. Jevremović was diagnosed of depression. The emotional distress that Ms. Courville has inflicted on Ms. Jevremović has exacerbated physical conditions of Ms. Jevremović as well.

215. As a direct and proximate result of Ms. Courville's intentional infliction of emotional distress, including the doxing and cyber-harassment of Ms. Jevremović, so severe that no reasonable person could be expected to endure it, Ms. Jevremović has been, and will continue to be damaged.

### **SIXTH COUNT**

#### **Negligent Infliction of Emotional Distress**

#### **(By Plaintiff Lima Jevremović against All Defendants)**

216. Plaintiffs incorporate the allegations set forth above in Paragraphs 1 through 215 as though fully set forth in this paragraph.

217. Defendants acted negligently when Defendants published and otherwise distributed Plaintiff's home address (three different private addresses after Ms. Jevremović has been forced to move as a result of Ms. Courville's doxing), Ms. Jevremović's mother's

home address,<sup>60</sup> Ms. Jevremović's sister's private home address, along with release of links to pornography with the false suggestion that it is Ms. Jevremović in the pornography, and the myriad false statements and releases of private information as pleaded above.

218. Defendants' acts resulted in damage to Ms. Jevremović and her family, including but not limited to, forcing Ms. Jevremović and her family to relocate, and to hire 24/7 security.

219. Defendants conduct herein has caused Ms. Jevremović extensive additional mental anguish and financial harm. As of April 2024, Ms. Jevremović was clinically diagnosed with depression. Ms. Jevremović has been regularly visiting a psychiatrist and mental therapist. Ms. Jevremović is also developing heart condition related to the emotional distress that she is suffering from.

220. Ms. Jevremović has suffered, and continues to suffer, emotional distress as a result of Defendants' wrongful conduct. She regularly sees a psychiatrist and a therapist. In April 2024, Ms. Jevremović was diagnosed of depression. The emotional distress that Ms. Courville has negligently inflicted on Ms. Jevremović has exacerbated physical conditions of Ms. Jevremović as well.

221. As a direct and proximate result of Ms. Courville's negligent infliction of emotional distress, including the doxing and cyber-harassment of Ms. Jevremović, so severe that no reasonable person could be expected to endure it, Ms. Jevremović has been, and will continue to be damaged.

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<sup>60</sup> <https://www.youtube.com/watch?v=CLiFEyC0WK8> (Accessed September 5, 2023). When accessed on October 22, 2024, the video is no longer available. It is hereby submitted that Defendants admitted that this video should not have been published because Ms. Courville removed the video at a later date.

**SEVENTH COUNT**

**Tortious Interference with Contractual Relations**

**(By Plaintiff AURA against All Defendants)**

222. Plaintiffs hereby incorporate the allegations set forth above in Paragraphs 1 through 221 as though fully set forth in this paragraph.

223. By or around March 2022, AURA received \$1.5 million for funding, and was valued at approximately \$10 million. AURA received investment from seasoned investors.

224. Defendants tortiously interfered with the contracts that AURA had with its investors by, among other things, intentionally disseminating false information that harms AURA's reputation.

225. The interference was intentionally inflicted by Defendants, who are not party to those contracts, and without justification.

226. The interference caused harm to AURA because the investors that had already invested in AURA chose to renege on their investment due to Defendants' false statements and accusations.

227. AURA was closed in February 2024.

228. As a direct and proximate result of Defendants tortious interference with AURA's contractors and its investors, AURA has suffered and will continue to suffer damages.

**EIGHTH COUNT**

**Tortious Interference with Prospective Economic Advantage**

**(By Plaintiff AURA against All Defendants)**

229. Plaintiffs hereby incorporate the allegations set forth above in Paragraphs 1 through 228 as though fully set forth in this paragraph.

230. By or around March 2022, AURA received \$1.5 million for funding, and was valued at approximately \$10 million. AURA received investment from seasoned investors.

231. Many prospective investors showed demonstrated interest in investing in AURA, and expressed their interest either orally or by providing a Letter of Intent.

232. After Defendants began publishing false and defamatory statements that cause harm to AURA's reputation, the prospective investors, including those who had provided a Letter of Intent, refused to invest in AURA.

233. Defendants intentionally interfered with AURA's prospective contractual or economic relationship intentionally without justification of excuse.

234. Defendants' intentional interference caused AURA's loss of the expected advantage.

235. As a direct and proximate result of Defendants tortious interference with AURA's potential investors, AURA has suffered and will continue to suffer damages.

**WHEREFORE**, Plaintiffs, Ms. Jevremović and AURA, hereby demand the following relief in favor of Ms. Jevremović and AURA, and against Defendants:

- a. A permanent injunction to remove all statements and publications adjudged libelous and to estop Defendants from publishing additional actionable statements under the causes of action alleged;
- b. Awarding Plaintiffs actual damages;
- c. Awarding Plaintiffs punitive damages;
- d. Awarding Plaintiffs special damages damage to reputations, losses of business opportunities, and losses of investment opportunities;
- e. Awarding Plaintiffs interest;

- f. Attorneys' fees and costs of suit; and
- g. Any other relief the Court deems equitable and proper.

**DEMAND FOR JURY TRIAL**

Plaintiffs hereby demand a trial by jury for all matters triable.

Respectfully submitted,

*s/ Elliot D. Ostrove*

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Elliot D. Ostrove, Esq. (Bar No. 025581997)

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*s/ Rodney Smolla*

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Attorneys for Plaintiffs Lima Ms. Jevremović and  
Autonomous User Rehabilitation Agent, LLC

Dated: October 23, 2024

NEW JERSEY DISTRICT COURT LOCAL RULE 11.2 CERTIFICATION

I, Lima Jevremović, on my own behalf and on behalf of Autonomous User Rehabilitation Agent, LLC ("AURA"), hereby declare the following:

1. I am a Plaintiff in the present case, a citizen of California and the United States of America.
2. I am also the CEO of Autonomous User Rehabilitation Agent, LLC and, as such, I am authorized to make statements on the Company's behalf.
3. I have fully reviewed the foregoing Third Amended Complaint, and aver that the matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and to those matters I believe them to be true.

I hereby certify that the matter in controversy in the foregoing Fourth Amended Complaint is not the subject of any other civil action pending in any court, or of any pending arbitration or administrative proceeding, with the exception of the matter pending in Superior Court of the State of California, County of Los Angeles, Case No.: 24STRO00762, captioned *Lima Jevremović v. Brittany Jeream Courville*, and the matter pending in Superior Court of the State of California, County of Los Angeles – Central District, Case No.: 23STRO05821, captioned *Lima Jevremović v. Brittany Jeream Courville*.

I certify under penalty of perjury that the foregoing is true and correct. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Executed on October 23, 2024



Lima Jevremović, on my own behalf, and  
on behalf of Autonomous User  
Rehabilitation Agent, LLC